

BRACEWELL

December 24, 2020

VIA ECF

Honorable Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Colinford Mattis and Urooj Rahman,
Criminal Docket No. 20-203 (BMC)

Dear Judge Cogan:

I write, with the consent of the government, to seek a modification of Urooj Rahman's bail conditions in the above-captioned case. As the Court knows, Ms. Rahman is on house arrest (she lives with her mother in Brooklyn) with electronic monitoring. She is permitted to leave the apartment for work, religious services, and other purposes, but only with the permission of Pre-Trial Services. The proposed modification is this: Ms. Rahman would continue to wear an electronic monitoring device but would be free to move within Manhattan, the Bronx, Brooklyn and Queens between 8:00 a.m. and 6:00 p.m. weekdays. Movement outside that geographic area (but within the Southern and Eastern Districts of New York) or outside that designated time period would be permitted only with the permission of Pre-Trial Services. The co-signed bond, of course, would remain in place.

As noted, the government (AUSA Ian Richardson) consents to this modification. Pre-Trial Services (Officer Ramel Moore) has authorized me to inform the Court that Ms. Rahman has been fully compliant with her current bail conditions. The policy of Pre-Trial Services, however, is not to consent to a bail modification absent a "change in circumstances," and so it leaves the matter to the Court.

I would add that the proposed modification should significantly reduce the burden on Pre-Trial Services; it will make it unnecessary for Ms. Rahman to contact her officer if she needs to take her mother to the doctor or go to the pharmacy to get medication, or if her work schedule changes.

Paul Shechtman
Partner

T: +1.212.508.6107 F: +1.800.404.3970
1251 Avenue of the Americas, 49th Floor, New York, New York 10020-1100
paul.shechtman@bracewell.com bracewell.com

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I thank the Court for its consideration of this matter.

Respectfully submitted,

/s/ Paul Shechtman

Paul Shechtman
Partner

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